

*B*  
ORIGINAL

CLERK US DISTRICT COURT  
NORTHERN DIST. OF TX  
FILED

2014 AUG -8 PM 12: 25

*WT*

UNITED STATES OF AMERICA

v.

RICHELE NICKI MYLES (01)

§  
§  
§  
§  
§

No. 3:13-CR-493-B

### **FACTUAL RESUME**

Richele Nicki Myles, the defendant, Jeffrey C. King, the defendant's attorney, and the United States of America (the government), represent the following elements and facts to this Honorable Court, as follows:

### **ELEMENTS OF THE OFFENSE**

Possession of a Firearm and Dangerous Weapon in a Federal Facility  
18 U.S.C. § 930(b)

*First:* That the defendant possessed or caused to be present a firearm or other dangerous weapon;

*Second:* in a federal facility;

*Third:* the defendant did so knowingly; and

*Fourth:* the defendant did so with the intent that the firearm or other dangerous weapon be used in the commission of a crime.

**STIPULATED FACTS**

1. On or about November 8, 2013, the defendant, Richele Nicki Myles, was a member of the U.S. Army Reserves and she performed her official duties at the Reserve Center located in Grand Prairie, Texas, which is in the Northern District of Texas. Myles knew that she was not authorized to bring a firearm to the Reserve Center, or into any building located there.

2. On or about November 8, 2013, Captain Russell Langford, also a member of the U.S. Army Reserves, worked in Building 8300 at the Reserve Center. Building 8300 is a “Federal facility” as that term is defined in 18 U.S.C. § 930(g)(1). Myles worked in the supply building across the street from Building 8300.

3. On or about November 8, 2013, Myles became upset with Captain Langford regarding his order for her to conduct a supply inventory. Myles, angry at Captain Langford, went to her car parked at the Reserve Center and retrieved a firearm, to wit: a Taurus model PT 738 .380 caliber pistol, bearing serial number 78598B. Myles then entered Building 8300 with this firearm in her hand and walked toward Captain Langford’s office with the intent to confront Captain Langford with the firearm.

4. Myles approached to within 50 feet of Captain Langford, reversed direction, returned to the entrance of Building 8300, and sat in a chair in the lobby. At this point, other personnel approached Myles and confronted her about the pistol. Myles then left Building 8300 with the pistol.

5. Myles agrees that had she confronted Captain Langford with the firearm in her

hand under these circumstances that he reasonably would have feared that his life was in danger.

6. Myles stipulates that on or about November 8, 2013, at the Reserve Center located in Grand Prairie, Texas, she did knowingly possess and cause to be present a firearm, to wit: a Taurus model PT 738 .380 caliber pistol, bearing serial number 78598B inside Building 8300, which is a Federal facility, and Myles did so with the intent to commit a crime, to wit: an assault upon Captain Langford, with this firearm. Myles stipulates that this conduct violated 18 U.S.C. § 930(b).

////////////////////////////ONLY SIGNATURES FOLLOW //////////////////////////////

AGREED TO AND SIGNED this 7<sup>TH</sup> day of AUGUST,  
2014.

SARAH R. SALDAÑA  
UNITED STATES ATTORNEY

  
J. MARK PENLEY  
Assistant United States Attorney  
Texas State Bar No. 15750700  
1100 Commerce Street, Third Floor  
Dallas, Texas 75242-1699  
Telephone: 214.659.8600  
Facsimile: 214.659.8805  
[Mark.penley@usdoj.gov](mailto:Mark.penley@usdoj.gov)

  
RICHÉLE NICKI MYLES  
Defendant

  
JEFFREY C. KING  
Attorney at Law  
Texas State Bar No. 24038039  
3131 McKinney Ave., Suite 825  
Dallas, Texas 75204  
Telephone: 214/416-9100  
Facsimile: 214/416-9107  
[jeff@jeffkinglaw.com](mailto:jeff@jeffkinglaw.com)  
Attorney for Defendant